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## Mars Khaimov Law, PLLC

### VIA ECF

Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

February 29, 2024

**MEMO ENDORSED**

Re: *Case 1:23-cv-11036-JGLC Zelvin v. Colonial Wine & Spirits, Inc.*  
Request for Extension of Time to Submit Opposition

Dear Judge Clarke:

Plaintiff submits this letter-motion seeking an extension of time to file an opposition to Defendant's Motion to Dismiss or Transfer Venue, dated February 16, 2024. The original deadline is March 1, 2024, and Plaintiff requests an extension up to and until March 11, 2024, to allow time for further research to be done prior to drafting the opposition papers.

This is the first time this relief is being requested, and defense counsel has graciously consented to it.

We thank Your Honor for the attention and consideration herein.

Respectfully submitted,

*/s/ Mars Khaimov*  
Mars Khaimov, Esq.  
Attorneys for Plaintiff

Cc: all Counsel of record on ECF

The deadline for Plaintiff to oppose Defendant's Motion to Dismiss or Transfer Venue, *see* ECF No. 8, is hereby EXTENDED to **March 11, 2024**. The parties are reminded that the deadline to file the joint letter regarding settlement and ADR, *see* ECF No. 5, is due **March 11, 2024**.

Dated: March 1, 2024  
New York, New York

SO ORDERED.

JESSICA G. L. CLARKE  
United States District Judge

